

AR 226 - 1027

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8EHQ-0601-0373

8EHQ-80-373

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June 7, 2001

MR 42630

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ATTN: Section 8(e) Coordinator
Office of Pollution, Prevention and Toxics
US Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

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Re: TSCA 8(e) Supplemental notice for Sulfonate-based and Carboxylic-based
Fluorochemicals-Docket numbers 8EHQ-1180-373; 8EHQ-1180-374; 8EHQ-0381-0394;
8EHQ-0598-373 *CORRECTIONS to May 15, 2001 Notice

Dear Docket Coordinator:

3M submitted an 8e notice dated May 15, 2001, for the above subject with incorrect
chemical descriptions in the tables. Attached is a corrected first page of that notice
(corrections highlighted in blue).

PFHS should be described by the formula: $C_6F_{13}SO_3^-$ PFOSA should be described by the formula: $C_8F_{17}SO_2NH_2$

Please contact Dr. Larry Zobel at 651-733-5181 for additional questions relative to this
notice.

Sincerely,

Georjean L. Adams
Manager, Corporate Product Responsibility

2001 JUN 20 PM 1:37
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May 15, 2001

Document Processing Center (7407)
ATTN: Section 8(e) Coordinator
Office of Pollution, Prevention and Toxics
US Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

*CORRECTIONS to May 15, 2001 Notice
made June 5, 2001

Re: TSCA 8(e) Supplemental notice for Sulfonate-based and Carboxylic-based Fluorochemicals-Docket numbers 8EHQ-1180-373; 8EHQ-1180-374; 8EHQ-0381-0394; 8EHQ-0598-373

Dear Docket Coordinator:

3M recently completed analyses of several fluorochemical compounds in individual, stored human sera. We have previously reported results of perfluorooctane sulfonate for human sera from pooled samples.^(1, 2) In the current analyses, individual samples were measured for sulfonate-based and carboxylic-based compounds. Table 1 represents samples of 599 individuals from 23 different states in the U.S. in the age span 2-12. These samples were drawn in 1995. Table 2 represents over 600 individuals from six blood banks across the United States, focusing in the age span 20-69. These samples were drawn in 2000. 3M will send a final report on these analyses to the EPA in the near future.

Table 1. Summary of Samples Drawn in 1995, Ages 2-12

| Compound | Average | Median | 95 th percentile | Range |
|---|-------------------------|----------|-----------------------------|-------------------------------|
| PFOS C ₈ F ₁₇ SO ₃ ⁻ | 43.5 ppb ^(a) | 36.7 ppb | 90.2 ppb | 6.7-515 ppb |
| *PFHS C ₆ F ₁₃ SO ₃ ⁻ | 15.0 ppb | 3.8 ppb | 71.3 ppb | <LLOQ ^(b) -712 ppb |
| PFOSAA C ₈ F ₁₇ SO ₂ N(C ₂ H ₅)- CH ₂ CO ₂ ⁻ | 4.4 ppb | 3.7 ppb | 10.4 ppb | <LLOQ-23.8 ppb |
| M570 C ₈ F ₁₇ SO ₂ N(CH ₃)- CH ₂ CO ₂ ⁻ | 3.4 ppb | 1.8 ppb | 12.5 ppb | <LLOQ-48.0 ppb |
| *PFOSA C ₈ F ₁₇ SO ₂ NH ₂ | <LLOQ | <LLOQ | <LLOQ | <LLOQ |
| M556 C ₈ F ₁₇ SO ₂ NH- CH ₂ CO ₂ ⁻ | 3.0 ppb | 2.5 ppb | 7.3 ppb | <LLOQ-19.1 ppb |
| PFOA C ₇ F ₁₅ CO ₂ ⁻ | 5.6 ppb | 5.1 ppb | 10.2 ppb | <LLOQ-56.1 ppb |

(a) ppb is parts per billion; (b) <LLOQ is less than the lower limit of quantification

Table 2. Summary of Blood Bank Samples Drawn in 2000, Focusing on Ages 20-69

| Compound | Average | Median | 95 th percentile | Range |
|---|----------|----------|-----------------------------|----------------|
| PFOS C ₈ F ₁₇ SO ₃ ⁻ | 43.7 ppb | 35.8 ppb | 90.5 ppb | <LLOQ-1656 ppb |
| *PFHS C ₆ F ₁₃ SO ₃ ⁻ | 2.9 ppb | 1.6 ppb | 9.6 ppb | <LLOQ-66.3 ppb |
| PFOSAA C ₈ F ₁₇ SO ₂ N(C ₂ H ₅)- CH ₂ CO ₂ ⁻ | 3.0 ppb | 1.4 ppb | 7.6 ppb | <LLOQ_60.1 ppb |
| M570 C ₈ F ₁₇ SO ₂ N(CH ₃)- CH ₂ CO ₂ ⁻ | 1.8 ppb | 0.9 ppb | 5.3 ppb | <LLOQ_19.0 ppb |
| *PFOSA C ₈ F ₁₇ SO ₂ NH ₂ | <LLOQ | <LLOQ | <LLOQ | <LLOQ |
| M556 | <LLOQ | <LLOQ | <LLOQ | <LLOQ-12.9 ppb |

| | | | | |
|--|---------|---------|----------|----------------|
| C ₈ F ₁₇ SO ₂ NH- CH ₂ CO ₂ ⁻ | | | | |
| PFOA C ₇ F ₁₅ CO ₂ ⁻ | 5.6 ppb | 4.7 ppb | 12.9 ppb | <LLOQ-52.3 ppb |

Section 8(e) Coordinator
May 15, 2001
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Please contact me at 651-733-5181 for additional questions relative to the above analyses.

Sincerely,

/s/

Larry R. Zobel, MD MPH
Staff Vice President & Medical Director
3M Medical Department

- (1) Letter to TSCA 8(e) Co-ordinator, May 15, 1998
- (2) Perfluorooctane Sulfonate: Current Summary of Human Sera and Toxicology, January 21, 1999

Re: TSCA 8(e) Supplemental notice for Sulfonate-based and Carboxylic-based
Fluorochemicals-Docket numbers 8EHQ-1180-373; 8EHQ-1180-374; 8EHQ-0381-0394;
8EHQ-0598-373 *CORRECTIONS to May 15, 2001 Notice

Bc: 8e Committee
G. McCarney